

1 HEATHER E. WILLIAMS, CA Bar #122664  
2 Federal Defender  
3 ERIN SNIDER, CA Bar #304781  
4 Assistant Federal Defender  
5 Office of the Federal Defender  
6 2300 Tulare Street, Suite 330  
7 Fresno, CA 93721-2226  
8 Telephone: (559) 487-5561  
9 Fax: (559) 487-5950

10  
11 Attorneys for Defendant  
12 AARON CORRALES-TORRES

13  
14 IN THE UNITED STATES DISTRICT COURT  
15 FOR THE EASTERN DISTRICT OF CALIFORNIA

16  
17 UNITED STATES OF AMERICA,  
18 Plaintiff,  
19 vs.  
20 AARON CORRALES-TORRES,  
21 Defendant.

22 Case No. 1:25-cr-00055-KES-BAM

23 **STIPULATION TO VACATE STATUS  
CONFERENCE AND SET MOTION  
BRIEFING SCHEDULE; AND ORDER**

24 Date: July 28, 2025  
Time: 9:30 a.m.  
Judge: Hon.

25  
26 IT IS HEREBY STIPULATED by and between the parties through their respective  
counsel, Assistant United States Attorney Stephanie Stokman, counsel for plaintiff, and Assistant  
Federal Defender Erin Snider, counsel for Aaron Corrales-Torres, that the Court may vacate the  
status conference currently scheduled for June 11, 2025, at 1:00 p.m. and establish the following  
briefing schedule for a motion to dismiss: motion due June 16, 2025; opposition due July 7,  
2025; reply due July 21, 2025; motion hearing on July 28, 2025, at 9:30 a.m.

27  
28 The parties agree and request the Court find the following:

- 29 1. By prior order, this matter is set for a status conference on June 11, 2025.
- 30 2. The government has produced initial discovery, consisting of 1,857 Bates-marked  
31 items.
- 32 3. Counsel for the defendant requires additional time to review discovery, conduct  
33 research, and draft a motion to dismiss.

4. Defense counsel believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

5. The government does not object to the briefing schedule and proposed motion hearing date.

6. Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

7. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of June 11, 2025, to July 28, 2025, inclusive, is excludable pursuant to 18 U.S.C. § 3161(h)(1)(D), (h)(7)(A), and (h)(7)(B)(iv).

## **IT IS SO STIPULATED.**

Respectfully submitted,

**MICHELE BECKWITH**  
Acting United States Attorney

Date: June 4, 2025

*/s/ Stephanie Stokman*  
STEPHANIE STOKMAN  
Assistant United States Attorney  
Attorney for Plaintiff

**HEATHER E. WILLIAMS**  
Federal Defender

Date: June 4, 2025

*/s/ Erin Snider*  
ERIN SNIDER  
Assistant Federal Defender  
Attorney for Defendant  
AARON CORRALES-TORRES

111

111

111

111

11

## ORDER

IT IS SO ORDERED. The Court hereby vacates the status conference currently scheduled for June 11, 2025, at 1:00 p.m. and establishes the following briefing schedule for a motion to dismiss: motion due June 16, 2025; opposition due July 7, 2025; and reply due July 21, 2025. The matter is set for a motion hearing on **July 28, 2025, at 9:30 a.m. before the Honorable Kirk E. Sherriff**. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et seq.*, within which trial must commence, the time period of June 11, 2025, to July 28, 2025, inclusive, is excludable pursuant to 18 U.S.C. § 3161(h)(1)(D), (h)(7)(A), and (h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: June 4, 2025

/s/ *Barbara A. McAuliffe*  
UNITED STATES MAGISTRATE JUDGE